

## Fibre Box Association

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April 3, 2003

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
Room 1061  
5630 Fishers Lane  
Rockville, MD 20852

Subject: **Fibre Box Association (FBA) Support and Endorsement of the American Forest and Paper Association's (AF&PA) Comments Concerning Proposed Regulations for Registration of Food Facilities FDA Docket No. 02N-0276, and (2) Proposed Regulations for Prior Notice of Imported Food Docket No. 02N-0278**

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Dear Sir or Madam:

The Fibre Box Association (FBA) is the manufacturer's trade association representing and servicing the corrugated and solid fibre industry. Our industry manufactures and markets corrugated and solid fibre paperboard and products primarily consisting of packaging and shipping containers. FBA represents over 90% of the corrugated packaging production in the United States as well as some companies in Canada and Mexico.

The purpose of this communication is to advise that the Fibre Box Association strongly supports and endorses the American Forest and Paper Association's (AF&PA) comments submitted to FDA on April 2, 2003, (copy attached) regarding the Food and Drug Administration's (FDA) proposed regulations concerning:

1. Registration of Manufacturers of Food Packaging Materials – FDA Docket No. 02N-0276; and,
2. Import Notification Requirement of Packaging Materials – FDA Docket No. 02N-0278.

As indicated in AF&PA's comments, the regulations as drafted will impose an extreme burden on packaging and packaging component facilities of FBA member companies (in addition to many other facilities), with only a very limited and theoretical increase, if any, in the safety of the food supply.

FBA participated with AF&PA in the development of the comments concerning both these proposed regulations and strongly endorses and supports AF&PA's reasoning and request that the Food and Drug Administration consider the full impact of the proposed regulations on our industry.

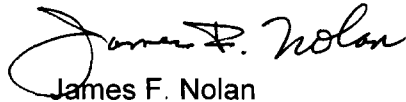
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FBA appreciates the opportunity to provide this letter of support and endorsement.  
Please direct any questions regarding this matter to the undersigned.

Sincerely,

A handwritten signature in black ink, reading "James F. Nolan". The signature is fluid and cursive, with the first name "James" and last name "Nolan" clearly legible.

James F. Nolan  
Senior Vice President

Cc: John L. Festa, AF&PA  
Sergio Galeano, Georgia-Pacific